

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GLOBAL MARINE SYSTEMS LIMITED,

Plaintiff,

v.

TYCO TELECOMMUNICATIONS (U.S.)
INC., TRANSOCEANIC CABLE SHIP CO.
INC.,

Defendants.

Case No.: 05-11605 RGS

JOINT MOTION TO MODIFY SCHEDULING ORDER

Plaintiff Global Marine Systems Limited (“Global Marine”) and defendants Tyco Telecommunications (U.S.) Inc. and Transoceanic Cable Ship Co. Inc. (“Tyco”) (collectively, the “Parties”) hereby move, pursuant to Local Rule 16.1(G), to modify the Scheduling Order issued by the Court on March 21, 2006 (the “Original Scheduling Order”). Grounds for this joint motion are as follows:

1. The Parties have been endeavoring to meet the deadlines imposed by the Original Scheduling Order. Recently, the Parties have begun to pursue settlement talks.

2. To accommodate these settlement discussions without accruing additional cost contemporaneously, the Parties jointly propose extending the various deadlines in the existing case schedule by approximately 60 days as follows:

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Opening Markman Briefs	August 25, 2006	October 20, 2006
Rebuttal Markman Briefs	September 22, 2006	November 17, 2006
Fact Discovery Completed	October 20, 2006	December 15, 2006
Service of Initial Expert Reports	November 17, 2006	January 12, 2007
Service of Rebuttal Expert Reports	January 12, 2007	March 9, 2007
Expert Discovery Completed	February 16, 2007	April 13, 2007
Dispositive Motions Filed	March 16, 2007	May 11, 2007

WHEREFORE, the parties jointly and respectfully request that the Court grant this Joint Motion to Modify the Scheduling Order for the reasons stated above.

TYCO TELECOMMUNICATIONS (U.S.)
INC., TRANSOCEANIC CABLE SHIP CO.
INC.,

By their attorneys,

/s/ Erik J. Frick

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Date: August 9, 2006

GLOBAL MARINE SYSTEMS LIMITED,

By its attorneys,

/s/ Mark S. Freeman

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and that paper copies will be sent to those non-registered participants (if any) on August 9, 2006.

/s/ Stacy Blasberg
Stacy L. Blasberg

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